

McCue Sussmane Zapfel & Cohen P.C.

420 Lexington Avenue
Suite 2250
NEW YORK, NEW YORK 10170

TELEPHONE: (212) 931-5500
FACSIMILE: (212) 931-5501

VIA ECF

September 2, 2022

Hon. Alvin K. Hellerstein
United States Courthouse
500 Pearl Street
New York, New York 10007

Re: Laba v. JBO Worldwide Supply Pty Ltd., No. 1:20-cv-03443

Dear Judge Hellerstein:


Plaintiff Remi Laba ("Plaintiff") submits this letter-motion pursuant to Section 4(B)(ii) of this Court's Individual Rules, which governs redactions and sealed filings requiring Court approval. Pursuant to Section 4(B)(ii), Plaintiff has publicly filed redacted certain exhibits attached to Kenneth Sussmane's declaration in support of Plaintiff's memorandum of law for summary judgment. These exhibits are documents that Defendant JBO Worldwide Supply Pty Ltd. ("Defendant") produced and stamped "Confidential- Attorneys' Eyes Only". Unredacted versions have been filed under seal.

In preparation of this letter-motion, counsel for Plaintiff contacted counsel for Defendant to inquire whether Defendant would de-designate any of these documents. Counsel for Defendant has not responded.

Plaintiff is unaware of any confidential information that warrants filing the documents under seal. Plaintiff makes this motion and files these documents under seal due to Defendant's designation in production. Accordingly, pursuant the Court's Individual Rules, Plaintiff filed these materials under seal to provide Defendant or any other party an opportunity to provide a basis to seal these documents.

Notice is hereby given that any such party seeking to preserve the sealing of these materials must file, within three days, a letter explaining the need to seal or redact the materials pursuant to the Court's Individual Rules.

Respectfully submitted,



Kenneth Sussmane
Attorney for Plaintiff

The motion is denied as lacking sufficient justification. *See Hartford Courant Co. v. Pellegrino*, 371 F.3d 49, 62-63 (2d Cir. 2004) (requiring a party to demonstrate that suppression of records is essential to overcome the presumption of openness that attaches to judicial records).

SO ORDERED.

/s/ Alvin K. Hellerstein
September 7, 2022